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*Attorneys for Defendants Pacific Payment Technologies d/b/a Ubiquity, Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha Sollinger and Nancy LaBier*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

GAIA BOTANICALS, LLC.

Plaintiff,

V.

PACIFIC PAYMENT TECHNOLOGIES,  
LLC d/b/a, UBIQUITY, TRE' LAGE, LLC,  
MARIN RAIN, INC., NEIL HABOUSH,  
NEIL SOLLINGER, MARK SOLLER,  
JAMES T. LOVERN, PASHA SOLLINGER,  
NANCY E. LABIER, Does 1-50 and XYZ  
Corps., 1-50,

## Defendants.

Case No. 2:18-cv-00789-APG-PAL

**JOINT STIPULATION AND ORDER  
EXTENDING DEFENDANTS PACIFIC  
PAYMENT TECHNOLOGIES, LLC d/b/a,  
UBIQUITY, TRE' LAGE, LLC, NEIL  
HABOUSH, NEIL SOLLINGER, MARK  
SOLLER, PASHA SOLLINGER AND  
NANCY E. LABIER'S TIME TO FILE AN  
ANSWER OR OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

Complaint filed: May 1, 2018

Plaintiff, Gaia Botanicals, LLC (“Plaintiff”), and Defendants Pacific Payment Technologies d/b/a Ubiquity, Tre’lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha Sollinger and Nancy LaBier (“Stipulating Defendants”), by and through their respective counsel, file this Joint Stipulation Extending Defendants’ Time to File an Answer or Otherwise Respond to Plaintiff’s Complaint (First Request). Stipulating Defendants request an extension up to and including August 17, 2018 to answer or otherwise respond to Plaintiff’s Complaint.

Plaintiff filed its Complaint on May 1, 2018. (ECF No. 1). Summons were issued to all

Defendants on June 19, 2018. (ECF No. 16). Good cause exists to extend the time for Stipulating Defendants to respond to the Complaint. This case involves multiple Defendants who were served on different dates, and Stipulating Defendants have all retained Naylor & Braster as counsel. The extension will establish a uniform date for all Stipulating Defendants to respond and will provide sufficient time for Naylor & Braster to review the case.

This is the first stipulation for extension of time for time for Stipulating Defendants to respond to Plaintiff's Complaint. This stipulation is made in good faith and will not prejudice any party.

LIPSON NEILSON P.C.

NAYLOR & BRASTER

By: /s/ *Kaleb D. Anderson*

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## KENT, BEATTY & GORDON, LLP

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By: /s/ Andrew J. Sharples

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*Attorneys for Defendants Pacific Payment Technologies d/b/a Ubiquity, Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha Sollinger and Nancy LaBier*

## ORDER

IT IS SO ORDERED that Defendants Pacific Payment Technologies d/b/a Ubiquity, Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha Sollinger and Nancy LaBier have up to and including August 17, 2018 to file an answer or otherwise respond to Plaintiff's Complaint

Dated this 2nd day of August 2018.

Tyra A. Tees  
UNITED STATES MAGISTRATE JUDGE